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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

WELLS FARGO BANK, NATIONAL
ASSOCIATION, AS TRUSTEE FOR THE
STRUCTURED ADJUSTABLE RATE
MORTGAGE LOAN TRUST, MORTGAGE
PASS-THROUGH CERTIFICATES
SERIES 2005-11,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC., et al.,

Defendants.

Case No.: 2:21-cv-00383-KJD-EJY

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
CHICAGO TITLE INSURANCE
COMPANY'S TIME TO RESPOND
TO MOTION FOR REMAND [ECF
No. 6] AND MOTION FOR FEES AND
COSTS [ECF No. 7]**

(Third Request)

1 Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff Wells Fargo
2 Bank, National Association (“Wells Fargo”) (collectively, the “Parties”), by and through their
3 counsel of record, hereby stipulate and agree as follows:

- 4 1. On March 5, 2021, Wells Fargo filed its Complaint in the Eighth Judicial District
5 Court, Case No. A-21-830602-C [ECF No. 1-1];
- 6 2. On March 7, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No.
7 1];
- 8 3. On April. 6, 2021, Wells Fargo filed a Motion for Remand [ECF No. 6] and Motion
9 for Costs and Fees [ECF No. 7];
- 10 4. Chicago Title’s deadline to respond to Wells Fargo’s Motion for Remand and Motion
11 for Costs and Fees was initially April 20, 2021;
- 12 5. On April 21, 2021, the Court granted the Parties’ stipulation extending Chicago Title’s
13 deadline to respond to the Motion for Remand and Motion for Fees and Costs to May
14 20, 2021;
- 15 6. On May 17, 2021, the Court granted the Parties’ stipulation extending Chicago Title’s
16 deadline to respond to the Motion for Remand and Motion for Fees and Costs to June
17 18, 2021;
- 18 7. Chicago Title’s counsel is requesting an extension until July 9, 2021, to file its
19 response to the pending Motion for Remand and Motion for Costs and Fees;
- 20 8. Chicago Title requests another extension of time to respond to the Motion for Remand
21 and Motion for Costs and Fees to afford Chicago Title additional time to respond to
22 the legal arguments set forth in Wells Fargo’s motions;
- 23 9. Wells Fargo does not oppose the requested extension;
- 24 10. This is the third request for an extension which is made in good faith and not for
25 purposes of delay;

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1 **IT IS SO STIPULATED** that Chicago Title's deadline to respond to Wells Fargo's
2 Motion for Remand [ECF No. 6] and Motion for Costs and Fees [ECF No. 7] is hereby extended
3 through and including July 9, 2021.
4

5 Dated: June 14, 2021

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

6 By: /s/-- Sophia S. Lau
7 SCOTT E. GIZER
8 SOPHIA S. LAU
9 Attorneys for Defendant CHICAGO TITLE
INSURANCE COMPANY

10 Dated: June 14, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair
12 KEVIN S. SINCLAIR
13 Attorneys for Defendant CHICAGO TITLE
INSURANCE COMPANY

14 Dated: June 14, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Christina V. Miller
16 CHRISTINA V. MILLER
17 Attorneys for Plaintiff WELLS FARGO
BANK, NATIONAL ASSOCIATION

18 **IT IS SO ORDERED:**
19

20 Dated: 6/15/2021
21

By: 
22 UNITED STATES DISTRICT COURT JUDGE
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